REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: March 23, 2012

ANALYST: Ben Holly

I. COMMITTEE:

Bachmann for Congress²

C00410118

Daniel Puhl, Treasurer (2/1/12 - present)

Thomas C. Datwyler, Treasurer (10/5/11 - 1/31/12)

Daniel Puhl, Treasurer (2/8/11 - 10/4/11) Andy Parrish, Treasurer (12/7/10 - 2/7/11) Callie Wahl, Treasurer (1/29/10 - 12/6/10)

Christopher M. Marston, Trensurer (2/4/09 - 1/28/10) Jonathan F. Graham, Treasurer (7/15/08 - 2/3/09)

P.O. Box 25950

Woodbury, MN 55125-0950

II. RELEVANT STATUTES:

11 CFR § 104.3(a) and (b) 2 U.S.C. § 434(b)(2) and (4)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Bachmann for Congress ("the Committee") amended its 2008 30 Day Post-General, 2008 Year End, 2009 April Quarterly, 2009 July Quarterly, 2009 October Quarterly, 2010 April Quarterly, 2010 12 Day Pre-Primary, 2010 October Quarterly, 2010 12 Day Pre-General, 2010 30 Day Post-General, and 2011 April Quarterly Reports to disclose additional receipts of \$220,251.46 and additional disbursements of \$217,045.77, which were not disclosed in the original reports (Attachments 1 and 2).

² The Committee was registered under the name MicheleBachmann.com from 6/15/11 to 2/1/12.

2008 30 Day Post-General Report

On December 4, 2008, the Committee filed the original 2008 30 Day Post-General Report covering the period from October 16, 2008 through Nevember 24, 2008. The report disclosed \$2,142,828.17 in discursements on Linu 17 (Operating Expenditures) and \$155.00 on Line 20(a) (Refunds of Contributions to Individuals) of the Deteiled Summery Page (Image 28993693082).

On November 18, 2010, the Committee filed an Amended 2008 30 Day Post-General Report. The report disclosed \$2,143,428.17 in disbursements on Line 17 and \$155.00 on Line 20(a) of the Detailed Summary Page (Image 10991847319).

On May 17, 2011, the Committee filed an Americal 2008 30 Day Post-General Report. The report disclosed \$2,142,928.17 in disbursements on Line 17 and \$655.00 on Line 20(a) of the Detailed Summary Page, a total increase in dishumants of \$606.00 from the original report (Image 11931444479; Attackment 4).

On November 10, 2011, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the RFAI requested clarification regarding the increase in disbursements disclosed on the Amended 2008 30 Day Post-General Report, received May 17, 2011 that were not disclosed in the original filing (Image 11330015659).

On Descember 14, 2011, the Committee filed a Miscellaneous Electronic Document ("Form 99") in response to the RFAL. The Committee stated, in part:

"...Additional Line 17 and 20(a) disbursements of \$600.00. Reason- The committee erroneously under reported Line 17 disbursements of \$100.00 as well as Line 20(a) refunds to individuals for \$500.00" (Image 11953280929).

2008 Year End Report

On January 31, 2009, the Committee filed the original 2008 Year End Report covering the period from November 25, 2008 through December 31, 2008. The report disuloned \$63,289.05 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 29990944150).

On March 9, 2009 and November 18, 2010 the Committee filed Amended 2008 Year End Reports. The reports disclosed no change in disbursements from the original report (Images 29933102643 and 10991847824).

On May 17, 2011, the Committee filed an Amended 2008 Year End Report. The report disclosed \$63,561.15 in dishurantees on Line 17, art increase of \$272.10 from the original report (Image 11931444890; Attendment 4).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the

RFAI requested clarification regarding the increase in disbursements disclosed on the Amended 2008 Year End Report, received May 17, 2911, that were not disclosed in the original filing (Image 11330015659).

On December 14, 2011, the Committee filed a Form 99 that stated, in part: "...Additional Line 17 disbursements of \$272.10. Reason- The committee erroneously under reported Line 17 disbursements of \$272.10" (Image 11953280930).

2009 April Quarterly Report

On April 14, 2609, the Committee filed the original 2009 April Quarterly covering the period from January 1, 2009 through March 31, 2009. The report disclosed \$96,257.79 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 29935496336).

On September 17, 2010 and November 18, 2010, the Committee filed Amended 2009 April Quarterly Reports. The reports disclosed no change in disbursements from the original report (Images 10931280759 and 10991847848).

On May 17, 2911, the Committee filed an Amended 2099 April Quarterly Report. The report disclosed \$98,682.78 in disbursements on Line 17, an increase of \$2,424.99 from the original report (Image 11931444918; Attachment 4).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 26, 2011. Among other items, the RFAI requested clarification regarding the increase in disbursements disclosed on the Amended 2009 April Quarterly Report, received May 17, 2011, that were not disclosed in the original filing (Image 11330015659).

On December 14, 2011, the Committee filed a Form 99 that stated, in part: "...Additional Line 17 disburgements of \$2,424.99. Reason- The committee erroneously under reported Line 17 disburgements of \$2,424.99" (Image 11953280930).

2009 July Ouarterly Report

On July 15, 2009, the Committee filed the original 2009 July Quarterly Report covering the period from April 1, 2009 through June 30, 2009. The report disclosed \$130,975.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and \$101,245.53 on Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 29934264932). The report also disclosed \$120,412.31 in disbursements on Line 17 (Operating Expenditures) of the Betailed Summary Page (Image 29934264933).

Oh September 17, 2010, the Committee filed an Amended 2009 July Quarterly Report. The report disclosed \$121,910.00 in receipts on Line 11(a)(i) and \$110,460.53 on Line 11(a)(ii) of the Detailed Summary Page (Image 10931280887). The report disclosed no change in disbursements from the original report (Image 10931280888).

On November 18, 2010, the Committee filed an Amended 2009 July Quarterly Report. The report disclosed no changes in renains and distormanents from the previous amendment (Image 10991848055-56).

On May 18, 2011, the Committee filed an Amended 2009 July Quarterly Report. The report disclosed \$163,710.00 in receipts on Line 11(a)(i) and \$149,854.15 on Line 11(a)(ii) of the Detailed Summary Page, a total increase of \$81,193.62 from the Amended 2009 July Quarterly Report, received September 17, 2010 (Image 11931452512; Attachment 3). The report also disclosed \$120,536.66 on Line 17 of the Detailed Summary Page, an increase of \$124.35 from the original report (Image 11931452513; Attachment 4).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the RFAI requested clarification regarding the increase in receipts and dishumements disclosed on the Amended 2009 July Quarterly Report, received May 18, 2011, that were not disclosed in the original filing (Image 11330015659).

On December 14, 2011, the Committee filed a Form 99. The Committee stated, in part:

"...Additional Line 11(a)(i) and 11(a)(ii) receipts of \$81,193.62. Reason-The committee erroneously under reported Line 11(a)(i) and 11(a)(ii) online receipts of \$51,488.76. Furthermore, The increase in Line 11(a)(i) and 11(a)(ii) and 11(a)(ii) receipts is also related to the decrease in Line 11(a)(i) and 11(a)(ii) from the Amended 2009 October Quarterly Report, received 9.17.2010 / Amended 2009 October Quarterly Report, received 5.18.2011, which decreased Line 11(a)(i) and 11(a)(ii) receipts by \$29,704.86. The committee erroneously reported the dates of these receipts.

...Additional Line 17 disbursements of \$124.35. Reason- The committee erroneously under reported Line 17 disbursements of \$124.35" (Image 11953280928-30).

2009 October Ostarterly Report

On October 15, 2009, the Committee filed the original 2009 October Quarterly Report covering the period from July 1, 2009 through September 30, 2009. The report disclosed \$31,402.75 in receipts on Line 11(c) (Contributions from Other Political Committees) of the Detailed Summary Page (Image 29992960734).

On Saptenhar 17, 2010 and November 18, 2010, the Committee filed Amended 2009 October Quarterly Reports. The reports disclosed no change in receipts from the original report (Images 10991171909 and 10991848182).

On May 18, 2011, the Committee filed an Amended 2009 October Quarterly Report. The report disclosed \$53,402.75 in receipts on Line 11(c) of the Detailed Summary Page, an increase of \$7,000.00³ from the original report (Inrage 11931453914; Attachment 3).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Assong other items, the RFAI requested clarification regarding the increase in receipts disclosed on the Amended 2009 October Quarterly Report, received May 18, 2011, that were not disclosed in the original filing (Image 11330015659).

On December 14, 2011, the Committee filed a Form 99. The Committee stated, in part: "...Additional Line 11(c) receipts...- Reason- The committee erroneously under reported a deposit for \$7,000" (Image 11953280928).

2010 April Quarterly Report

On April 15, 2010, the Committee filed the original 2010 April Quarterly Report covering the period from January 1, 2010 through March 31, 2010. The report disclosed \$473,052.59 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and \$0.00 on Line 15 (Other Receipts) of the Detailed Summary Page (Image 10990571821). The report also disclosed \$268,937.39 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10990571822).

On June 21, 2010, the Committee filed an Amended 2010 April Quarterly Report. The report disclosed \$775,132.53 in reneipts on Line 11(a)(i) and \$0.00 on Line 15 of the Detailed Summary Page (Image 10930851357). The report also disclosed \$269,737.80 in disbursements on Line 17 of the Detailed Summary Page (Image 10930851358).

On September 17, 2010, the Committee filed an Amended 2010 April Quarterly Report. The report disclosed \$777,132.53 in receipts on Line 11(a)(i) and \$0.00 on Line 15 of the Detailed Summary Page (Image 10931281653). The report disclosed no change in disbursements on Line 17 from the previous amendment (Image 10931281654).

On November 18, 2010, the Committee filed an Amended 2010 April Quarterly Report. The report disclosed no changes in receipts or disburseneents from the previous amendment (Image 10991853014).

On May 18, 2011, the Committee filed an Amended 2010 April Quarterly Report. The report disclosed \$894,887.71 in receipts on Line 11(a)(i) and \$1,579.05 on Line 15 of the Detailed Summary Page, a total increase of \$119,334.23 from Amended 2010 April Quarterly Report, received September 17, 2010 (Image 11931462541; Attachment 3). The report also disclosed \$276,011.89 in disbursements on Line 17 of the Detailed Summary Page, an increase of \$6,274.09 from the Amended 2010 April Quarterly Report, received September 17, 2010 (Image 11931462542; Attachment 4).

³ The Committee also disclosed \$15,000.90 in additional receipts which are not included in this referral because they were previously disclosed on the original 2909 July Querturly Report.

On August 29, 2011, an RFAI was sent to the Committee referencing the Amended 2010 April Quarterly Report, received May 18, 2011. The RFAI requested clarification regarding the increase in receipts disclosed on the Amended 2010 April Quarterly Report, received May 18, 2011, that were not discussed on the original filing (Image 11330012960).

On October 3, 2011, the Committee filed a Form 99 that stated, in part:

"...The amendment filed was a result of a self-initiated review of all transactions. This was conducted at the Committees expense to ensure full compliance with laws and regulations. The committee anticipates no further amendments. The increase in contributions occurred because the Committee overloaded contributions make online in January 2010 and the first half of February 2010" (Image 11952501132).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the RFAI requested clarification regarding the increase in disbursements disclosed on the Amended 2010 April Quarterly Report, received May 18, 2011, that were not disclosed in the original filing (Image 11330015659).

On December 14, 2011, the Committee filed a Form 99 that stated, in part: "...Additional Lists 17 disbrasements of \$6,274.09. Reason- The committee erroneously under reported Line 17 disbursements of \$6,274.09 for credit card fees." (Image 11953280930)

2010 July Quarterly Report

On July 15, 2010, the Committee filed the original 2010 July Quarterly Report covering the period from April 1, 2010 through June 30, 2010. The report disclosed \$90,037.20 in receipts on Line \$1(c) (Contributions from Other Political Committees), and \$0.00 on Line 15 (Other Receipts) of the Detailed Summary Page (Image 10990903430). The report also disclosed \$0.00 in disbursements on Line 20(b) (Refunds of Contributions to Political Party Committees) of the Detailed Stramary Page (Image 10990903431).

On September 17 and November 18, 2010, the Committee filed Amended 2010 July Quarterly Reports. The amendments disclosed no change in the amount of receipts or disbursements from the original report (Images 10931287502-03 and 10991855998-99).

On May 18, 2011, the Committee filed an Amended 2010 July Quarterly Report. The report disclosed \$93,367.20 in receipts on Line 11(c), and \$3,034.52 on Line 15 of the Detained discussary Page, a total incomm in receipts of \$5,604.15 from the original import (Image 11931466086; Attachment 3). The report also disclosed \$4,800.00 in distursances.

⁴ The Committee also disclosed \$1,906.00 in additional rescipts on Line 11(a)(i) which are not included in this referral instance they were previously dissinued on Line 11(a)(ii) of the emiginal 2010 July Quarterly Report.

on Line 20(b), an increase of \$4,800.00 from the original report (Image 11931466087; Attachment 4).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Raport, received May 20, 2011. Areang other items, the RFAI requested clarification regarding the increase in receipts and disbursements disclosed on the Amended 2010 July Quarterly Report, received May 18, 2011, that were not disclosed in the original filing (Image 11330015659).

On December 14, 2011, the Committee filed a Form 99, which stated, in part:

"...Additional Line 11(a)(i), 11(c), and 15 ruceigns of \$8,270.52. Reason-The committee erroneously under reported a deposit for \$2,569.63....The additional Line 15 receipts of \$3,634.52 came from interest income that was erroneously unreported.

...Additional Line 20(b) disbursements of \$4,800. Reason-The committee erroneously under reported Line 20(b) refund to political parties of \$4,800.00" (Image 11953280928-30).

2010 12 Day Pre-Primary Report

On July 29, 2010, the Committee filed the original 2010 12 Day Pre-Primary Report covering the period from July 1, 2010 through July 21, 2010. The report disclosed \$149,874.41 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) of the Detailed Summary Page (Image 10991031302).

On September 20, 2010, the Committee filed an Amended 2010 12 Day Pre-Primary Report. The report disclosed \$150,399.41 in receipts on Line 11(a)(i) of the Detailed Summary Page (Image 10991191962).

On November 18, 2010, the Committee filed an Amended 2010 12 Day Pre-Primary Report. The seport disclosed \$150,769.41 in receipts an Line 11(a)(i) of the Detailed Summary Page (Image 10991856789).

On May 18, 2011, the Committee filed an Aniended 2010 12 Day Pre-Primary Report. The report disclosed \$153,684.41 in receipts on Line 11(a)(i) of the Detailed Summary Page, an increase of \$3,285.00 from the Amended 2010 12 Day Pre-Primary Report, received September 20, 2010 (Image 11931467016; Attachment 3).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the RFAI required clarification segarding the increase in reweipts disclosed on the Amended 2010 12 Day Pre-Primary Report, received May 18, 2011, that were not disclosed in the original filing (Image 11330015659).

On December 14, 2011, the Committee filed a Form 99, which stated, in part:

"...Additional Line 11(a)(i) receipts of \$3,285.00. Reason-There were three check contributions tombing \$291.00, which were roturned NSF and were not removed from the report until after it was filed. The increase in Line 11(a)(i) receipts is also related to the 2010 30 Day Post-General Report / Amended 2010 30 Day Post-General Report, received 5.18.2011, which decreased Line 11(a)(i) and 11(a)(ii) receipts by \$3,576.00. The increase in Line 11(a)(i) was because duplicate entries within the reporting database were not combined until after the report was originally filed. The committee also erroneously reported the dates from online receipts" (Image 11953280929).

2010 October Quarterly Report

On October 15, 2010, the Committee filed the original 2010 October Quarterly Report covering the period from July 22, 2010 through September 30, 2010. The report disclosed \$1,649,937.48 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and \$2,558.85 on Line 15 (Other Receipts) of the Detailed Summary Page (Image 10931515578). The report also disclosed \$3,850,171.08 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10931515579).

On November 22, 2010, the Cemmittee filed an Amended 2010 October Quarterly Report. The report disclosed \$1,653,944.48 in seceipts on Line 11(a)(i) and \$2,558.85 on Line 15 of the Detailed Summary Page (Image 10991862677). The report disclosed no change in dishursements from the original report (Image 10991862678).

On February 8, 2011, the Committee filed an Amended 2010 October Quarterly Report. The report disclosed \$1,875,081.93 in receipts on Line 11(a)(i) and \$3,851.46 on Line 15 of the Detailed Summary Page (Image 11930340003). The report also disclosed \$3,907,509.24 in disbursements on Line 17 of Detailed Summary Page (Image 11930340004).

On May 18, 2011, the Committee filed an Armunded 2010 Octuber Quarterly Report. The report disclosed \$1,651,015.23 in receipin on Line 11(a)(i) and \$3,851.46 on Line 15 of the Detailed Summary Page, a total increase of \$2,370.36 from the original report (Image 11931470003; Attachment 3). The report disclosed no changes in disbursements from the previous amendment, which showed an increase of \$57,338.16 from the original report (Image 11931470004; Attachment 4).

On August 29, 2011, an RFAI was sent to the Committee referencing the Amended 2010 October Quarterly Report, received May 18, 2011. The RFAI requested clarification regarding the increase in disbursement disclosed on the Amended 2010 October Quarterly Report, received May 18, 2011, that were not disclosed in the original filings (Image 11330012962).

On October 3, 2011, the Committee filed a Form 99 that stated, in part:

"...The amendment filed was a result of a self-initiated review of all transactions. This was conducted at the Committees expense to ensure full complitutes with laws and regulations. The committee anticipates no further amondments. The antire immease in disbursements coourned because the Committee lacked the information on our credit card fees when the report was filed" (Image 11952501133).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the RFAI requested clarification regarding the increase in receipts disclosed on the Amended 2010 October Quarterly Report, received May 18, 2011, that were not disclosed in the original filings (Image 11330012962).

On Denomber 14, 2011, the Committee filed a Form 99 that stated, in part:

"...Additional Line 11(a)(i) and 15 receipts of \$2,370.36. Reason- The committee erroneously under reported a deposit for \$1,077.75. The additional Line 15 receipts of \$1,292.61 came from interest income that was erroneously unreported" (Image 11953280929).

2010 12 Day Pre-General Report

On October 21, 2010, the Committee filed the original 2010 12 Day Pre-General Report covering the period from October 1, 2010 through October 13, 2010. The report disclosed \$2,435,970.10 in disbursements on Line 17 (Operating Expenditures) and \$74,750.00 on Line 21 (Other Disbursements) af the Detailed Summary Page (Image 10991765930).

On November 3, 2010, the Committee filed an Amended 2010 12 Day Pre-General Report. The report disclosed no change in disbursements from the original report (Image 10931781112).

On November 17, 2010, the Committee filed an Amended 2010 12 Day Pre-General Report. The report disclosed \$2,572,932.60 in disburance on Line 17 ami \$75,750.00 on Line 21 of the Detailed Summary Page, a total increase of \$137,962.50 from the original report (Image 10991841047; Attachment 4).

On November 22, 2010, the Committee filed an Amended 2010 12 Day Pre-General Report. The report disclosed no change in disbursements from the previous amendment (Image 10991865647).

On January 6, 2011, an RFAI was sent to the Committee referencing the Amended 2010 12 Day Pre-General Report, received Novamber 22, 2010. Among other things, the RFAI requested clarification mandage the increase in distrementant disclosed on the Amended 2010 12 Day Pre-General Report, received November 22, 2010, that were not disclosed in the original filings (Image 11030532238).

On February 8, 2011, the Committee filed a Form 99 that stated, in part:

"...The increase of \$137,962.50 in disbursements occurred because we did not have the information on our credit cand fees when the report was filed. There are: CD Inc.- \$72,825.03 Edorations- \$41,820.67 Campaign Solutions- \$22,316.80 However, Bill Johnson for Congress- \$1,000, was omitted due to a data entry error" (Image 11990214180).

On February 8, 2011 and May 18, 2011, the Committee filed Amended 2010 12 Day Pre-General Reports. The reports disclosed no change in disbursements from the previous amendment (Images 11990206235 and 11931473265, respectively).

2010 30 Day Post-General Report

On December 2, 2010, the Committee filed the original 2010 30 Day Post-General Report covering the period from October 14, 2010 through November 22, 2010. The report disclosed \$2,519,810.11 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10992316610).

On February 8, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed \$2,527,059.69 in disbursements on Line 17 of the Detailed Summary Page, an increase of \$7,249.58 from the original report (Image 11990210005; Attachment 4).

On May 18, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed no changes in disbursements from the previous amendment (Image 11931474309).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the RFAI requested clarification regarding the increase in disbursements disclosed on the Amended 2010 30 Day Post-General Report, received May 18, 2011, that were not disclosed in the original fifting (Image 11336015659).

On December 14, 2011, the Committee filed a Ferm 99 that stated, in part: "...Additional Line 17 disbursements of \$7,249.58. Reason-The committee erroneously under reported Line 17 disbursements of \$7,249.58 for credit card fees" (Image 11953280930).

2011 April Quarterly Report

On April 15, 2011, the Committee filed the original 2011 April Quarterly Report covering the period from January 1, 2011 through March 31, 2011. The report disclosed \$1,190.37 in receipts on Line 15 (Other Receipts) of the Detailed Summary Page (Image 11930687560).

On May 18, 2011, the Committee filed an Amended 2011 April Quarterly Report. The report disclosed no change in rescipts on Line 15 from the original report (Image 11931476444).

On May 20, 2011, the Committee filed an Amended 2011 April Quarterly Report. The report disclosed \$1,894.10 in reneipts on Line 15, an increase of \$703.73 from the original report (Image 11931496094; Attachment 3).

On November 10, 2011, an RFAI was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 20, 2011. Among other items, the RFAI requested clarification regarding the increase in receipts disclosed on the Amended 2011 April Quarterly Report, received May 20, 2011, that were not disclosed in the original filing (Image 11330015659).

On December 12, 2011, the Committee filed an Amended 2011 April Quarterly Report. The report disclosed no change in receipts on Line 15 from the previous amendment (Image 11972716333).

On December 14, 2011, the Committee filed a Form 99 that stated, in part: "...The additional Line 15 receipts of \$703.73 came from interest income that was erroneously unreported" (Image 11953280929).

On January 13, 2012, the Reports Analysis Division (RAD) Analyst exiled the treasurer, Mr. Thomas Datwyler. The Analyst explained that the matter involving increased activity on the amended reports would be forwarded to another office for further Commission action. Among other items, the Analyst noted the Form 99 received on December 14, 2011, and said the Committee had an option to provide further clarification on this matter for the public record. Mr. Datwyler said that the information in the Form 99 was as complete as he could provide. He explained that the errors on the original reports occurred before he was involved with the campaign. He said he did his best to contact individuals who were involved with the campaign at that time to obtain information; however, many have since dispersed. It was his impression that some receipts and disbuncaments were not tracked correctly before he became traceurer, as he undertack an integral audit of the Committee's finances. He said he was confident that the information disclusion on the recent amendments were accurate and everything was in order going forward (Attachment 5).

On January 16, 2012, Mr. Datwyler filed a Form 99 stating, in full:

"The amendments filed were a result of a self-initiated review of all transactions. This was conducted at the Committees expense to ensure full compliance with laws and regulations. The review was conducted for reason that occurred before I had any association with the campuign" (Image 12950092205).

To date, no further communications have been received from the Committee regarding these matters.

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O-Index (2009-2010)
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Overview of Additional Receipts

Report Name	Total Additional Receipts	Line Number(s)
Amended 2009 July Quarterly Report, received 9/17/10/Amended 2009 July Quarterly Report, received 5/18/11	\$81,193.62	l l(a)(i), l l(a)(ii)
2009 October Quarterly Report/Amended 2009 October Quarterly Report, received 5/18/11	\$7,000.00 ⁵	11(c)
Amended 2010 April Quarterly, received 9/17/10/Amended 2010 April Quarterly, asserved 5/18/11	\$119,334.23	11(a)(i), 15
Amended 2010 July Quarterly Report, received 9/17/10/Amended 2010 July Quarterly Report, received 5/18/11	\$6,364.52	11(c), 15
2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 5/18/11	\$2,370.36	11(a)(i), 15
Amended 2010 12 Day Pre-Primary Report, received 9/20/10/Amended 2010 12 Day Pre- Primary Report, acceived 5/18/11	\$3,285.00	11(a)(i)
2011 April Quarterly Report/Amended 2011 April Quarterly Report, received 5/20/11	\$703.73	15
المراجع المساحية المستعدد المس	250530 TU	Y

Overview of Additional Disbursements

Report Name 영화 등 교 : 전 표 II	Total Additional Disbursements	Line Number(s)
2008 30 Day Post-General Report/Amended 2008 30 Day Post-General Report, received 5/17/11	\$600.00	17, 20(a)
2008 Year End Report/Amended 2008 Year End Report, received 5/17/11	\$272.10	17
2009 April Quarterly Repurt/Amended 2009 April Quarterly Repert, received 5/17/11	\$2,424.99	17
Amended 2009 July Quarterly Report, received 9/17/10/Amended 2009 July Quarterly Report, received 5/18/11	\$124.35	17

⁵ The Committee also disclosed \$15000.00 in additional receipts which are not included in this referral because they were previously disclosed on the 2009 July Quarterly Report.

Overview of Additional Disbursements (cont.)

Amended 2010 April Quarterly Report, received 9/17/10/Amended 2010 April Quarterly Report, received 5/18/11	\$6,274.09	17
Amended 2010 July Quarterly Report, received 9/17/10/Amended 2010 July Quarterly Report, received 5/18/11	\$4,800.00	20(ъ)
2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 5/18/11	\$57,338.16	17
2010 12 Day Pre-General Report/Amended 2010 12 Day Pre-General Report, received 5/18/11	\$137,962.50	17, 21
2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 5/18/11	\$7,249.58	17
Total Additional Distance Teach	\$217,045.77	the state of the state of the

Total Increase in Activity on Amended Reports: \$437,297.23

Additional Receipts by Line Number

Amended 2009 July Quarterly Report, received 9/17/10/Amended 2009 July Quarterly Report, received 5/18/11

Report Line	Amended 2009 July Quarterly Report received 9 pto 10 (Image 31 to 1250 85)	Amended 2009 July Quarterly Report Treceived 5/15/fit (Image II 3/14525/12)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$121,910.00	\$163,710.00	\$41,800.00
Line 11(a)(ii): Unitemized Contributions from Individuals	\$110,460.53	\$149,854.15	\$39,393.62
		SCHOOL STATES	[[李成]] 100000000000000000000000000000000000

2009 October Quarterly Report/Amended 2009 October Quarterly Report, received 5/18/11

	Quarterly Report (Image 20992960734)	Amended 2009 =0	Amount
Line 11(c): Contributions from Other Political Committees	\$31,402.75	\$53,402.75	\$7,000.00 ⁶
	•	Top Vadence	35/4(0)(jjil)

⁶ The Committee also disclosed \$15,000.00 in additional receipts which are not included in this referral because they were previously disclosed on the original 2009 July Quarterly Report.

Additional Receipts by Line Number (cont.)

Amended 2010 April Quarterly, received 9/17/10/Amended 2010 April Quarterly, received 5/18/11

Report Line	Amended 2010 April Quarterly, received 9/1±/10 (timage 10931231635)	Amended 2010 April _ Quarterly, received 5/18/14 = (1-наде 119314/1341)	
Line 11(a)(i): Itemized Contributions from Individuals	\$777,132.53	\$894,887.71	\$117,755.18
Line 15: Other Receipts	\$0.00	\$1,579.05	\$1,579.05
		TO TO THE SECOND	

2010 July Quarterly Report/Amended 2010 July Quarterly Report, received 5/18/11

	2010.34ts Ouerterby kepol (#tinage 10990903430)	Amended 2010 July - \ - \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	- , nce Amount
Line 11(c): Contributions from Other Political Committees	\$90,037.20	\$93,367.20	\$3,330.00
Line 15: Other Receipts	\$0.00	\$3,034.52	\$3,034.52
		Likal variance "	_ W. 0552

Amended 2010 12 Day Pre-Primary Report, received 9/20/10/Amended 2010 12 Day Pre-Primary Report, received 5/18/11

Line 11(a)(i): Itemized Contributions from Individuals	\$150,399.41	\$153,684.41	\$3,285.00
i il li il	Amended 2010 12 Day Pre-Primary Report Lecolyce 9/2010 (Image 	Amended 2010-12 Day Pro. Primary Peport received zero receivingel 11931467016)	Veriance_ rsuo-tre

Additional Receipts by Line Number (cont.)

2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 5/18/11

		Jackenic - Jil	
Report Line	2010 October Quarterly Report (Image 1095:5155/87) ET]		_{ki} Elpiance = _Trount ^{Tal} →
Line 11(a)(i): Itemized Contributions from Individuals	\$1,649,937.48	\$1,651,015.23	\$1,077.75
Line 15: Other Receipts	\$2,558.85	\$3,851.46	1,292.61
		CERTIFICATION	725237038

2011 April Quarterly Report/Amended 2011 April Quarterly Report, received 5/20/11

Line 15: Other Receipts	\$1,190.37	\$1,894.10	\$703.73
المستخطرة	2011 April Quarterly Report (mage 11930687560)	Amended 2011 April 11. 21 1 1 7 2 porta- received 5/20/11 (Image 1 222; 956 No.)	Amount

Additional Disbursements by Line Number

2008 30 Day Post-General Report/Amended 2008 30 Day Post-General Report, received 5/17/11

Report Line		Amended 2008 30 Day Post-General Pepont received 5/17/11 ([mage 1195]4444/c/)	
Line 17: Operating Expenditures	\$2,142,828.17	\$2,142,928.17	\$100.00
Line 20(a): Refunds of Contributions to Individuals	\$155.00	\$655.00	\$500.00
<u> </u>		A protal variance	\$600:00

2008 Year End Report/Amended 2008 Year End Report, received 5/17/11

•		Total Variance:	×. 5272.10
Line 17: Operating Expenditures	\$63,289.05	\$63,561.15	\$272.10
Reportisme	- - 2000 Your End - Report (1111age 29990944150)	Aniended 2008 Year 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Variance Amount

2009 April Quarterly Report/Amended 2009 April Quarterly Report, received 5/17/11.

- 		Total Variance:	\$2,424,00
Line 17: Operating Expenditures	\$96,257.79	\$98,682.78	\$2,424.99
Report Line	2009 April Quarterly Report (Image 	Amended 2009 April — Quarterly Report. — 200 ej = 4 5/12/11 (Image 119/1444918)	Variance - Englyte

Additional Disbursements by Line Number (cont.)

2009 July Quarterly Report/Amended 2009 July Quarterly Report, received 5/18/11

Line 17: Operating	29934764935)	Image Hv31452515)	6104.25
Expenditures	\$120,412.31	\$120,536.66	\$124.35

Amended 2010 April Quarterly Report, received 9/17/10/Amended 2010 April Quarterly Report, received 5/18/11

Teport Line	Quarterly Report, received 9:17/19 (Image 10 13:2816, #.	Junedaca Zadrada da Quarterly Report, received 5/18/14 (Luage 119/1462/14)=	Variance Amount
Line 17: Operating Expenditures	\$269,737.80	\$276,011.89	\$6,274.09
		030 /2.3 = 93. 5	1, 1alp) -

2010 July Quarterly Report/Amended 2010 July Quarterly Report, received 5/18/11

Report Line	2010 July Quarterly Report (Image	Amended 2010 July Quarterly Report, The production of the product	Variance Cunt
Line 20(b): Refunds of Contributions to Political Party Committees	\$0.00	\$4,800.00	\$4,800.00
		· Total Cartinus	301(00)

Additional Disbursements by Line Number (cont.)

2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 5/18/11

			ALC: PLANT FOR ST
Line 17: Operating Expenditures	\$3,850,171.08	\$3,907,509.24	\$57,338.16
Report Line	2010 October Quarterly Report (Image 107315155/9)	- /Amenace 2073 October Quarterly - Report received - 5/18/11 ((mage) 119314/0634)	A nount

2010 12 Day Pre-General Report/Amended 2010 12 Day Pre-General Report, received 11/22/10

· - Report Line		Amended 2010 12 Day > [ki] 3kq)	Amount
Line 17: Operating Expenditures	\$2,435,970.10	\$2,572,932.60	\$136,962.50
Line 21: Other Disbursements	\$74,750.00	\$75,750.00	\$1,000.00
		HAND STOREGES	[1] "你是这点。

2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 5/18/11

Report Line	2010 30 Day Post- General Report	Amended 2010 30 Day Post-General Report, The story (5/18/14) (Image 1 [931474309)	Variance _Aposest =
Line 17: Operating Expenditures	\$2,519,810.11	\$2,527,059.69	\$7,249.58
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